



June 10, 2020

Dear Parks Commissioners:

It's time that Madison leaders prioritize human and environment health and race/class equity over tax dollars and profits for developers. **Preserving the full 30-acre Hartmeyer wetland area as a conservancy park, in line with the Friends of Hartmeyer Natural Area, is a step in that direction.**

How will this decision affect human and environmental health and race/class equity? See further details below.

Public health & the environment

For decades, the large Oscar Mayer site spewed sewage, animal wastes, cooling water wastes, and a plethora of other contaminated stormwater into the Yahara River and [Starkweather Creek](#)—and then to Lake Monona and downstream waters. Oscar Mayer's sewage effluents [played a significant role in over-fertilizing Lake Monona](#) and contaminating its fish and the people who eat it, including many low income, minority subsistence anglers.

Though the Oscar Mayer factory is no longer in operation, as I wrote in my [February 10, 2020](#) comments to the Plan Commission, very little of the significant toxic contamination in soils and groundwater there, including documented high levels of chlorinated compounds and metals, and also likely (but mostly unmeasured) PCB and PFAS contamination, has been investigated and remediated. The site still discharges these contaminants into stormwater drains that lead to Starkweather Creek and the Yahara River, and then to Lake Monona.

Any development on this site will further exacerbate polluted stormwater runoff from the site, regardless of regulations and the DNR Brownfields program. Even when stormwater laws are followed (which, in practice, is often not the case), excavation and construction for developments inevitably disrupt contaminated soils and groundwater that run off into storm drains when it rains. This can be reduced somewhat with good erosion control practices, but cannot be completely (or even substantially) prevented. More importantly, after development is completed, even if green infrastructures are incorporated into the developments, over the long-term more buildings, roads, and parking lots mean more impervious surfaces, more cars/parking, fewer trees and less or no wetlands.

One doesn't need technical expertise to understand that more urban developments—along with loss of trees, vegetation, wetlands—will increase flooding and contaminated runoff into storm sewers and waterways. Raingardens direct contamination downward to groundwater. There is no “cake and eat it too” or “win-win” way to develop and also prevent water pollution. Period.

Bottom line? The more land that can be left undeveloped, the less polluted runoff will go into the lake and the better it will be for human, wildlife, and environmental health.

Race/class equity and environmental justice

On [February 13, 2018](#), Toriana Pettaway, Equity Coordinator for the City, conducted diversity training for the OMSAP Committee to help them be more “inclusive in their decision-making processes” and organized activities to help committee members consider how their decisions “will affect a diverse group of people and communities who are not at the table and may not always have a voice.” Annette Miller also organized focus groups and other meetings to engage

under-represented groups and get their input on the OMSAP. We commend the OMSAP for including these trainings and for outreach to engage low income and people of color.

Unfortunately, there is no evidence that the committee considered toxic contamination at the site and how it might affect the health of diverse communities who may or may not have been at the table. Focus group participants wouldn't have known about the toxic contamination at the site, and considered its effects on human and environmental health—including health of people of color and low income people--unless the committee informed them of it. There is no evidence that they did so.

The toxic contamination discharged from the Oscar Mayer site, and the former Burke sewage plant used by Oscar Mayer for many years, into Starkweather Creek and Lake Monona negatively affects human health in many ways. Most importantly, these contaminants make their way into fish that are consumed by low income and minority subsistence anglers, who often depend on the fish to feed their families.

A recent [Northside News article](#) featured MEJO's collaboration with East Madison Community Center teens to address PFAS in Starkweather Creek, which runs through the Truax neighborhood where the teens live. High levels of PFOS, one of the most toxic PFAS compounds, which builds up in fish, were found just downstream of the Burke golf ditch, which drains from the former sewage site used by Oscar Mayer.

Are conservation parks only for white, privileged people?

Defending their stance against the FHNA 30-acre conservation park proposal, the [June 8, 2020 city staff memo](#) says "Anecdotally, staff has heard persons of color often do not feel comfortable in urban natural areas because those spaces and users don't feel welcoming to them. Repeating this type of open space on the Hartmeyer property will not help create a space for all Madison's residents."

Unfortunately, this statement reflects narrow cultural assumptions and racial stereotypes. A growing body of research supports the importance of urban green space for health, environmental justice and racial equity—see: https://link.springer.com/chapter/10.1007/978-3-030-10469-6_4. In fact, the [2018 report](#) summarizing the OMSAP focus groups with under-represented people listed "open and green space" as one of the things participants appreciated about living in Madison.

MEJO has worked with many low income people of color (African American, Hispanic, Hmong, African, Ho-Chunk, and other Native Americans) who have close relationships with and passion for nature, fish and wildlife, and wild/natural areas. MEJO has organized numerous events engaging people from diverse backgrounds in [exploring and foraging in urban parks](#), [fishing](#), and [meetings with diverse community members](#) to discuss and develop ways to [clean up creeks](#) and urban natural areas and address [stormwater runoff into Starkweather Creek](#).

Madison shoreline parks are extremely popular among anglers of color. I know from talking with hundreds of subsistence anglers on Madison shorelines over the last couple decades that [many African Americans regularly travel to Madison lakes from Milwaukee, and even Racine and Chicago](#) to fish for food for themselves, their families and friends. Some told me they come here because they do not feel comfortable fishing on the Milwaukee Lake Michigan shoreline or in small towns between Milwaukee and Madison—because they have experienced overt racism there (as [this article illustrates](#)). This doesn't mean they don't experience any racism in Madison while fishing—they do. A few years ago, white bicyclists tried to ban fishing along the bike path in front of Monona Terrace, a popular fishing spot for African American anglers.

If some people of color don't feel comfortable in Madison natural areas because, as city staff wrote "those spaces and users don't feel welcoming to them," which may be the case in some places (such as those described above), rather than using this as a reason not to increase urban natural areas, perhaps city leaders should ask--why don't these people of color feel comfortable in these areas? How can we change this, how can make these spaces more welcoming and comfortable to everyone regardless of race or class, and to engage diverse people more equitably in these places?

Thank you for considering my comments,

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